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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 MELVIN NICHOLAS,

9 Plaintiff,

10 vs.

11 TRANS UNION, LLC; EXPERIAN
12 INFORMATION SOLUTIONS, INC.; CONN
13 APPLIANCES, INC.; LAS VEGAS FINANCE;
14 AND SUN LOANS, LLC,

15 Defendants.

Case No.: 2:23-cv-02110-JCM-BNW

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S AMENDED COMPLAINT
(SECOND REQUEST)**

16 Plaintiff, Melvin Nicholas ("Plaintiff"), and Defendant, Conn Appliances, Inc.
17 ("Defendant") (collectively "Parties"), by and through their counsel of record, hereby stipulate and
18 agree as follows:

19 On February 16, 2024, Plaintiff filed his First Amended Complaint [ECF No. 19].
20 Defendant was served with Plaintiff's First Amended Complaint on February 16, 2024. On March
21 6, 2024, this Court entered an Order that extended Defendant's deadline to respond to the First
22 Amended Complaint to April 1, 2024.

23 The Parties have discussed extending the deadline for Defendant to respond to Plaintiff's
24 First Amended Complaint to allow for better investigation of the allegations and discuss possible
25 resolution of the matter. If the parties cannot resolve the matter by the new deadline, the parties
26 will likely stipulate to remove the case to arbitration.

27 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to
28 file its responsive pleading to Plaintiff's First Amended Complaint to May 1, 2024.

1 This is the second request for an extension of time for Defendant to file its responsive
2 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
3 any other party.

4 As part of this stipulation, Defendant agrees to participate in any Rule 26(f) conference
5 that occurs during the pendency of this extension.

6 DATED this 1st day of April, 2024.

7
8 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

9 /s/ Ramir M. Hernandez

/s/ Gerardo Avalos

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13 *Inc.*

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Attorneys for Plaintiff, Melvin Nicholas

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17 IT IS SO ORDERED:

18 
19 UNITED STATES MAGISTRATE JUDGE

20
21 DATED: 4/2/2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT (SECOND REQUEST)** on the 1st day of April, 2024, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP